

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

---

UNITED STATES

v.

JEROME LASSITER

---

---

)  
)  
)  
) No. 04-10114-DPW  
)  
)  
)

**DEFENDANT'S MOTION FOR ADVANCE PRE-SENTENCE REPORT**

The defendant, Jerome Lassiter, hereby moves this Court to direct the U.S. Probation Office to conduct a pre-sentence investigation and prepare the report in advance of a judgment in this case. In support of this motion, the defendant states it is in the interests of justice to determine prior to trial or to a change of plea what issues may exist potentially affecting the defendant's sentence in the event he is convicted. Provision of this material, including an assessment of the defendant's criminal history, is necessary and material to the defendant's evaluation of the case and the penalties he may face if found guilty at trial.

JEROME LASSITER

By his attorney,

/s/ John H. Cunha Jr.

John H. Cunha Jr.

B.B.O. No. 108580

CUNHA & HOLCOMB, P.C.

One State Street, Suite 500

Boston, MA 02109-3507

617-523-4300

Dated: September 20, 2004

H:\Word\Crim\Lassiter\Motion for advance PSR.wpd